IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

EASTERN PROFIT CORPORATION LIMITED,

Plaintiff/Counterclaim Defendant,

v.

Case No. 1:18-cv-2185-JGK

STRATEGIC VISION US, LLC,

Defendant/Counterclaim Plaintiff,

v.

GUO WENGUI a/k/a Miles Kwok,

Counterclaim Defendant.

NOTICE OF MOTION TO QUASH

PLEASE TAKE NOTICE THAT, upon this motion and the accompanying memorandum of law in support, Kin Ming "William" Je ("Mr. Je"), by and through counsel, will move this Court before the Honorable John G. Koeltl, United States District Judge, United States Courthouse, 500 Pearl Street, New York, New York, 10007, at a time and date to be determined by the Court, for an Order, pursuant to Federal Rule of Civil Procedure 45, quashing the subpoena served by Defendant/Counterclaim Plaintiff Strategic Vision US, LLC ("Strategic") on Google, LLC.

Dated: December 23, 2019 Respectfully submitted,

SCHULMAN BHATTACHARYA, LLC

By: <u>/s/ Jeffrey S. Gavenman</u>

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